

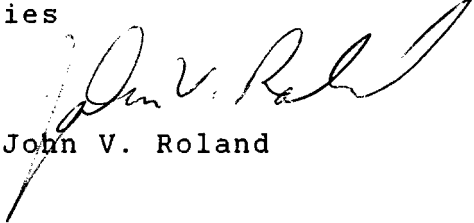
M E M O R A N D U M

VIRGINIA WATER CONTROL BOARD

OFFICE OF WATER RESOURCES MANAGEMENT

SUBJECT: OWRM GUIDANCE MEMO NO. 92 -005
Pretreatment Program Priorities

TO: Regional Directors

FROM:  Larry G. Lawson, P. E., and  John V. Roland

DATE: February 27, 1992

Copies: Bob Burnley, LaVern Corkran, Bob McEachern, Martin Ferguson, Regional Office Water Resource Managers, Regional Office Compliance Auditors, Regional Office Pretreatment Personnel,

At the pretreatment workshop on February 11, 1992, you requested guidance on the priorities for the pretreatment program. Thus, the purpose of this memorandum is to provide you with guidance on the items in the pretreatment program that we consider as priorities.

As you know one of our primary responsibilities in administering the pretreatment program is the oversight of the POTWs implementation of their pretreatment program. The objective of the POTW oversight is to determine on an ongoing basis whether the POTW's approved programs are being adequately implemented, and whether the approved programs are effective and consistent with the current regulatory requirements.

The oversight mechanisms that we use are the audit of the POTW with the completion of a check list and follow-up deficiency letters, the PPETS/WENDB system of PCS, Industrial User (IU) inspections with the completion of the check list and follow up deficiency letters, and annual reports provided by the POTWs.

Thus, to carry out this oversight responsibility we believe the pretreatment program priorities for the Regional Offices are to ensure that the following are achieved:

1. The 106 requirements are met, this includes annual audits of each pretreatment program, inspection of the Category IUs in approved POTW programs every other year

and in non-pretreatment cities every year, inspection of Significant IUs every 5-6 years, and that deficiencies noted are corrected within a specific time period.

2. The legal mechanism of the POTW's approved program meets the regulatory requirements. There was a legal review done at the federal level and the analysis was sent to the regional offices with a request to transmit these to the appropriate POTWs with a request for a 60 day time frame for correcting the deficiencies. The legal authority submissions for approval must be accompanied by an attorneys statement outlining the changes in the legal authority and that they are adequate to meet the regulatory requirements. This time frame has long since passed.
3. The interjurisdictional agreements are developed, where needed, and are approvable. These must accompany the legal mechanisms as they are an intergral part of the POTW's program.
4. The Enforcement Response Plans (ERPs) are submitted and meets the regulatory requirements. These are an integral part of the program and determine how the POTW will implement the program by taking enforcement actions against violators.
5. The local limits are properly derived and they are approvable, and the POTW IU permit boilerplate meets the regulatory requirements.
6. All SIUs are permitted with the appropriate local limits, boilerplate, monitoring frequency, type, sampling point location, and proper reporting is required.
7. The appropriate enforcement action is recommended when there is reluctance on the part of the POTW to meet the regulatory requirements.

The above items should be completed by January 31, 1993 so that our programs are current and meet the regulatory requirements. This gives us nearly a year to accomplish these priorities and that should be sufficient time since many of the elements are in some state of development.

For your information, there are some items that we in headquarters will be working on to assist in the administration of the program. One of these items is to determine if the present oversight mechanisms are adequate tools for implementing the primary goals

of the pretreatment program (protect against interference, pass through, safety and sludge contamination), and the secondary goal of the program (uniform compliance with pretreatment standards and requirements). Another item we plan to work on to assist in the oversight responsibility is to develop a data management system at the regional/headquarters level.

If you have any questions regarding the pretreatment program or the contents of this memorandum please feel free to contact LaVern Corkran, John Roland, or Larry Lawson.